

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN

In re: )  
 ) Case No. 11-25284-svk  
 ) Chapter 13  
STANLEY MILLER, )  
 )  
Debtor. )

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**OBJECTION TO TRUSTEE'S MOTION TO DISMISS**

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Please take notice that the debtor, Stanley Miller, by their attorneys, DeLadurantey Law Office, LLC, by Nathan E. DeLadurantey, hereby object to the Motion to Dismiss as brought by Mary B. Grossman, Chapter 13 Trustee.

The debtor asserts that he is planning to make a lump sum payment or file a plan modification to address the feasibility issue raised by the trustee.

The Debtor respectfully requests that the Court schedule a hearing on the matter.

**PLEASE TAKE NOTICE** that a telephone hearing will be held before the Honorable Susan V. Kelley, United States Bankruptcy Judge, on **December 22, 2015** at **11:00A M** to consider the Trustee's Motion to Dismiss this case. **To appear by telephone, you must call the Court conference line at 1-888-675-2535, access code 9918878 before the scheduled hearing time.** Please note that the Court may already be in session, so please wait quietly on the telephone for your case to be called. The Debtor is welcome, but not required to participate in this hearing.

Dated: December 2, 2015.

DeLadurantey Law Office, LLC  
Attorneys for Debtors

/s/

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By: Nathan E. DeLadurantey  
State Bar No. 1063937

Drafted by:  
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**CERTIFICATE OF SERVICE**

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Matthew Hoenig states under oath that he is over the age of 18 and a attorney at DeLadurantey Law Office, LLC, attorneys for the debtors, and that on December 2, 2015, he delivered true and correct copies of the attached "Objection to Trustee's Motion to Dismiss" and "Certificate of Service" via the CM/ECF system or first-class mail to the following parties:

Clerk, U.S. Bankruptcy Court  
Eastern District of Wisconsin  
*via CM/ECF*

Trustee Mary B. Grossman  
*via CM/ECF*

Office of the United States Trustee  
*via CM/ECF*

I certify under penalty of perjury that the foregoing is true and correct.

Executed on December 2, 2015.

Signed: /s/ Matthew Hoenig  
Matthew Hoenig

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